

## UNITED STATES DISTRICT COURT

for the  
District of New Jersey

Civil Division

KATINA OLIVIA BUCHANAN

Case No. \_\_\_\_\_

(to be filled in by the Clerk's Office)

*Plaintiff(s)**(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

-v-

INGRAM CONTENT GROUP, LIGHTNING SOURCE  
INCORPORATED, LLC*Defendant(s)**(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*Jury Trial: (check one) ☐ Yes ☒ No

## COMPLAINT FOR A CIVIL CASE

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Katina Olivia Buchanan
Street Address	225 6th Ave W
City and County	Newark, Essex
State and Zip Code	New Jersey, 07107
Telephone Number	862-373-7547
E-mail Address	katinabuchanan1@hotmail.com

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

## Defendant No. 1

Name	Ingram Content Group
Job or Title <i>(if known)</i>	Book Distributor
Street Address	1 Ingram Blvd
City and County	La Vergne, Rutherford
State and Zip Code	Tennessee, 37086
Telephone Number	615-793-5000
E-mail Address <i>(if known)</i>	Isicustomersupport@ingramcontent.com

## Defendant No. 2

Name	Lightning Source Incorporated, LLC
Job or Title <i>(if known)</i>	INGRAM CONTENT GROUP SUBSIDIARY
Street Address	1 Ingram Blvd
City and County	La Vergne, Rutherford
State and Zip Code	Tennessee, 37086
Telephone Number	800-509-4156
E-mail Address <i>(if known)</i>	Isicustomersupport@ingramcontent.com

## Defendant No. 3

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

## Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

- 1 - Violation of Computer Fraud and Abuse Act of the 1986 U.S. Cybersecurity Bill
- 2 - Fraud and False Statements; 18 U.S. Code Chapter 47; 1005-
- 3 - Embezzlement; 18 U.S.C. 656

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* \_\_\_\_\_, is a citizen of the  
State of *(name)* \_\_\_\_\_.

**b. If the plaintiff is a corporation**

The plaintiff, *(name)* \_\_\_\_\_, is incorporated  
under the laws of the State of *(name)* \_\_\_\_\_,  
and has its principal place of business in the State of *(name)* \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, *(name)* \_\_\_\_\_, is a citizen of  
the State of *(name)* \_\_\_\_\_. Or is a citizen of  
*(foreign nation)* \_\_\_\_\_.

## b. If the defendant is a corporation

The defendant, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.

Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

## 3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

**III. Statement of Claim**

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

The Defendants had an agreement with my publisher and were given the responsibility of issuing sales payments to me (a book Author), but instead has not made a sufficient payment, when asked has provided fictitious references about the publishing and distributing contractual industry, and also has provided documentation inconsistent with evidence that will be issued by the Plaintiff within the courts fact findings sector. They have also perpetrated during phone calls and refuted the validity of my claim all together despite blatant and clear exemplifications of reporting errors made by me directly to their representatives, giving me no other choice but to file a lawsuit.

**IV. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

For being victimized by embezzlement of my funds being the rightful owner of the sales accumulation for my book my demand is \$20,000; (\$8,687.65 for the quantity of books that is validated as sold and \$11,312.35 punitive damage), along with all print material and layout specifications, any quantity of my book available in their stock, confirmation of the deletion of my account, complete termination of any rights to distribute my book, and a statement of apology with No Harm Intended from the company's headquarters' management. The reason why I am entitled to punitive is due to the extensive work I put

into my book project. The amount of out of pocket fees which include publishing process, mailer supplies, book reviews, Google Ads, emails, phone calls, social media, and over 2 years of time that has vanished without a trace, as well as my intellectual property and clientele for upcoming books floating in cyberspace without my name and professionalism and under false reference of distributor not publisher in consistent with the assignment agreement itself.

## V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

### A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 02/28/2020

Signature of Plaintiff

Printed Name of Plaintiff

*Katrina Olivia Buchanan*

Katrina Olivia Buchanan

### B. For Attorneys

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address